

EXHIBIT 1

Archived: Monday, March 11, 2019 3:28:27 PM

From: Felipe Corredor

Sent: Friday, March 08, 2019 8:05:02 PM

To: Nishimoto, Ryan M.

Cc: David Bilsker; Sklenar, Jennifer; Boyd, Bridgette

Subject: RE: GE v. Bio-Rad - meet and confer regarding venue

Sensitivity: Normal

Ryan,

It will depend on what the Delaware Court does.

-Felipe

Felipe Corredor

Associate,
Quinn Emanuel Urquhart & Sullivan, LLP

50 California Street, 22nd Floor
San Francisco, CA 94111
415-875-6448 Direct
415.875.6600 Main Office Number
415.875.6700 FAX
felipecorredor@quinnemanuel.com
www.quinnemanuel.com

NOTICE: The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and as such is privileged and confidential. If the reader of this message is not the intended recipient or agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.

From: Nishimoto, Ryan M. [mailto:Ryan.Nishimoto@arnoldporter.com]

Sent: Friday, March 8, 2019 4:13 PM

To: Felipe Corredor <felipecorredor@quinnemanuel.com>

Cc: David Bilsker <davidbilsker@quinnemanuel.com>; Sklenar, Jennifer <Jennifer.Sklenar@arnoldporter.com>; Boyd, Bridgette <Bridgette.Boyd@arnoldporter.com>

Subject: RE: GE v. Bio-Rad - meet and confer regarding venue

Felipe,

Please advise as to whether Bio-Rad intends to seek transfer of the SDNY action to NDCA.

Ryan

Ryan Nishimoto

Arnold & Porter

Office: +1 213.243.4158

Mobile: +1 323.336.5165

ryan.nishimoto@arnoldporter.com

From: Felipe Corredor <felipecorredor@quinnemanuel.com>

Sent: Thursday, March 7, 2019 3:03 PM

To: Nishimoto, Ryan M. <Ryan.Nishimoto@arnoldporter.com>

Cc: David Bilsker <davidbilsker@quinnemanuel.com>; Sklenar, Jennifer <Jennifer.Sklenar@arnoldporter.com>

Subject: RE: GE v. Bio-Rad - meet and confer regarding venue

Ryan,

In light of your refusal to consent to a transfer of the Delaware action to the Southern District of New York, please circulate a draft of the joint status report you propose submitting to the Court on Monday.

Regards,

Felipe

Felipe Corredor

Associate,
Quinn Emanuel Urquhart & Sullivan, LLP

50 California Street, 22nd Floor
San Francisco, CA 94111
415-875-6448 Direct
415.875.6600 Main Office Number
415.875.6700 FAX
felipecorredor@quinnemanuel.com
www.quinnemanuel.com

NOTICE: The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and as such is privileged and confidential. If the reader of this message is not the intended recipient or agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.

From: Nishimoto, Ryan M. [<mailto:Ryan.Nishimoto@arnoldporter.com>]
Sent: Wednesday, March 6, 2019 1:53 PM
To: Felipe Corredor <felipecorredor@quinnemanuel.com>
Cc: David Bilsker <davidbilsker@quinnemanuel.com>; Sklenar, Jennifer <Jennifer.Sklenar@arnoldporter.com>
Subject: RE: GE v. Bio-Rad - meet and confer regarding venue

Felipe,

In view of your response indicating that Bio-Rad would seek to expand the litigation between the parties in the Southern District of New York beyond the '718 patent family, my clients are unwilling to agree to your proposal and do not consent to a transfer of the Delaware action to the Southern District of New York. Among other things, we believe that there may be venue issues with Bio-Rad's proposed patent infringement claims against various GE entities. We thus believe that the parties should proceed with their claims where venue was/is proper when filed under *TC Heartland* and 28 U.S.C. § 1400(b).

Ryan

Ryan Nishimoto
Arnold & Porter
Office: +1 213.243.4158
Mobile: +1 323.336.5165
ryan.nishimoto@arnoldporter.com

From: Felipe Corredor <felipecorredor@quinnemanuel.com>
Sent: Wednesday, February 27, 2019 6:19 PM
To: Nishimoto, Ryan M. <Ryan.Nishimoto@arnoldporter.com>
Cc: David Bilsker <davidbilsker@quinnemanuel.com>; Sklenar, Jennifer <Jennifer.Sklenar@arnoldporter.com>
Subject: RE: GE v. Bio-Rad - meet and confer regarding venue

Ryan,

As a follow-up to your email, the proposal is that, if the parties stipulate to transfer and consolidate the Delaware action with the SDNY case and remain in SDNY (i.e., that there will be no further motions to transfer), the parties would also stipulate that Bio-Rad have leave to bring counterclaims for patent infringement. And, since GE is the plaintiff, please propose a schedule for our consideration.

Regards,
Felipe

Felipe Corredor
Associate,
Quinn Emanuel Urquhart & Sullivan, LLP

50 California Street, 22nd Floor
San Francisco, CA 94111
415-875-6448 Direct
415.875.6600 Main Office Number
415.875.6700 FAX
felipecorredor@quinnemanuel.com
www.quinnemanuel.com

NOTICE: The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and as such is privileged and confidential. If the reader of this message is not the intended recipient or agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.

From: Nishimoto, Ryan M. [<mailto:Ryan.Nishimoto@arnoldporter.com>]
Sent: Monday, February 25, 2019 6:53 PM
To: Felipe Corredor <felipecorredor@quinnemanuel.com>
Cc: David Bilsker <davidbilsker@quinnemanuel.com>; Sklenar, Jennifer <Jennifer.Sklenar@arnoldporter.com>

Subject: FW: GE v. Bio-Rad - meet and confer regarding venue

Felipe - please let us know if you have any objection to our filing the attached, requesting an additional two weeks to discuss the issues below.

Ryan

Ryan Nishimoto
Arnold & Porter
Office: +1 213.243.4158
Mobile: +1 323.336.5165
ryan.nishimoto@arnoldporter.com

From: Nishimoto, Ryan M.
Sent: Monday, February 25, 2019 7:47 AM
To: 'Felipe Corredor'
Cc: David Bilsker; Sklenar, Jennifer
Subject: RE: GE v. Bio-Rad - meet and confer regarding venue

Felipe,

GEHC is considering Bio-Rad's proposal of agreeing to final venue in SDNY for both cases, and for leave to file counterclaims. Please send us what you are thinking by way of a written proposal that includes the nature of the counterclaims and a proposed schedule for a consolidated SDNY litigation.

In the meantime, attached is a proposed joint status report for Monday asking for an additional two weeks to update the court.

Ryan

Ryan Nishimoto
Arnold & Porter
Office: +1 213.243.4158
Mobile: +1 323.336.5165
ryan.nishimoto@arnoldporter.com

From: Felipe Corredor [<mailto:felipecorredor@quinnemanuel.com>]
Sent: Thursday, February 21, 2019 7:56 PM
To: Nishimoto, Ryan M.; Sklenar, Jennifer
Cc: David Bilsker
Subject: RE: GE v. Bio-Rad - meet and confer regarding venue

Ryan,

That works for us. We can use the dial-in below.

Participant Number- 2708146
Toll-Free Number-866-499-9580
International Number- 617-939-0024

-Felipe

From: Nishimoto, Ryan M. [<mailto:Ryan.Nishimoto@arnoldporter.com>]
Sent: Thursday, February 21, 2019 7:42 PM
To: Felipe Corredor <felipecorredor@quinnemanuel.com>; Sklenar, Jennifer <Jennifer.Sklenar@arnoldporter.com>
Cc: David Bilsker <davidbilsker@quinnemanuel.com>
Subject: RE: GE v. Bio-Rad - meet and confer regarding venue

Felipe - how about tomorrow (Friday) morning at 10a.

Ryan

Ryan Nishimoto
Arnold & Porter
Office: +1 213.243.4158
Mobile: +1 323.336.5165
ryan.nishimoto@arnoldporter.com

From: Felipe Corredor [<mailto:felipecorredor@quinnemanuel.com>]
Sent: Thursday, February 21, 2019 3:27 PM
To: Nishimoto, Ryan M.; Sklenar, Jennifer

Cc: David Bilsker

Subject: GE v. Bio-Rad - meet and confer regarding venue

Counsel,

Would you have availability this afternoon or tomorrow to meet and confer in advance of submitting the status report due to the SDNY court on Monday Feb. 25? Please let us know, as our availability will be limited on Monday and we would prefer to have a sense of where the parties stand before then.

Best regards,
Felipe

Felipe Corredor

Associate,
Quinn Emanuel Urquhart & Sullivan, LLP

50 California Street, 22nd Floor
San Francisco, CA 94111
415-875-6448 Direct
415.875.6600 Main Office Number
415.875.6700 FAX
felipecorredor@quinnemanuel.com
www.quinnemanuel.com

NOTICE: The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and as such is privileged and confidential. If the reader of this message is not the intended recipient or agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.

This communication may contain information that is legally privileged, confidential or exempt from disclosure. If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is strictly prohibited. Anyone who receives this message in error should notify the sender immediately by telephone or by return e-mail and delete it from his or her computer.

For more information about Arnold & Porter, click here:
<http://www.arnoldporter.com>

This communication may contain information that is legally privileged, confidential or exempt from disclosure. If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is strictly prohibited. Anyone who receives this message in error should notify the sender immediately by telephone or by return e-mail and delete it from his or her computer.

For more information about Arnold & Porter, click here:
<http://www.arnoldporter.com>

This communication may contain information that is legally privileged, confidential or exempt from disclosure. If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is strictly prohibited. Anyone who receives this message in error should notify the sender immediately by telephone or by return e-mail and delete it from his or her computer.

For more information about Arnold & Porter, click here:
<http://www.arnoldporter.com>

This communication may contain information that is legally privileged, confidential or exempt from disclosure. If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is strictly prohibited. Anyone who receives this message in error should notify the sender immediately by telephone or by return e-mail and delete it from his or her computer.

For more information about Arnold & Porter, click here:
<http://www.arnoldporter.com>